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21 AGENCY OF NEVADA, INC.

22 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
23 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

US BANK NATIONAL ASSOCIATION,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:20-CV-02068-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT [ECF No. 1]**

(FIRST REQUEST)

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG"), Chicago Title Insurance Company ("Chicago Title") and Chicago Title Agency of Nevada, Inc. ("Chicago Agency") (collectively "Defendants") and plaintiff U.S. Bank National Association ("U.S. Bank"), by and through their respective attorneys of record, which hereby agree and stipulate as

1 follows:

2 1. On November 10, 2020 U.S. Bank filed its complaint in the Eighth Judicial District
3 Court for the State of Nevada;

4 2. On November 10, 2020, Chicago Title removed the instant case to the United
5 States District Court for the State of Nevada (ECF No. 1);

6 3. On December 2, 2020, U.S. Bank served its complaint on Chicago Agency, and
7 subsequently served its complaint on FNTG and Chicago Title on December 3, 2020;

8 4. Chicago Agency's response to U.S. Bank's complaint is currently due on
9 December 23, 2020, while Chicago Title and FNTG's respective responses to U.S. Bank's
10 complaint are currently due on December 24, 2020;

11 5. Counsel for Defendants is requesting a roughly 30-day extension (31 days for
12 Chicago Agency, and 30 days for Chicago Title and FNTG) until Saturday, January 23, 2020 for
13 Defendants to file their respective responses to U.S. Bank's complaint to afford Defendants'
14 counsel additional time to review and respond to U.S. Bank's complaint.

15 6. Counsel for U.S Bank does not oppose the requested extension;

16 7. This is the first request for an extension made by counsel for Defendants, which is
17 made in good faith and not for the purposes of delay.

18 8. This stipulation is entered into without waiving any of Defendants objections under
19 Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to
2 the complaint is hereby extended through and including January 23, 2021.

3 Dated: December 16, 2020

SINCLAIR BRAUN LLP

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5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR

Attorneys for Defendants

7 CHICAGO TITLE INSURANCE

COMPANY, FIDELITY NATIONAL TITLE

8 GROUP, INC., and CHICAGO TITLE

AGENCY OF NEVADA, INC.

9 Dated: December 16, 2020

WRIGHT FINLAY & ZAK, LLP

10
11 By: /s/-Darren T. Brenner

12 DARRENT T. BRENNER

Attorneys for Plaintiff

13 U.S. BANK NATIONAL ASSOCIATION

14 **IT IS SO ORDERED.**

15 Dated this 16th day of December, 2020.

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17 CAM FERENBACH

UNITED STATES MAGISTRATE JUDGE